

DECLARATION OF RACHEL ABRAMS

I, Rachel Abrams, having personal knowledge of the following state:

1. I am a partner at the law firm of Peiffer Wolf Carr Kane Conway & Wise, LLP, attorneys of record for Plaintiff Jaylynn Dean (“Plaintiff”). I am a member in good standing of the Bar of the State of California. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so. I respectfully submit this declaration in support of Plaintiff’s Statement in Support of Defendants’ Administrative Motion to Seal, ECF No. 3192 (“Plaintiff’s Statement”).

2. I have reviewed Exhibits A and B to Joint Discovery Letter Brief Regarding Bellwether Plaintiff Jaylynn Dean and Social Media Production, filed under seal on June 6, 2025 (ECF 3191). Exhibits A and B are Plaintiff’s responses to discovery which include detailed information concerning Plaintiff’s reported sexual assault.

3. Exhibits A and B contain the Personally Identifiable Information (“PII”) of Plaintiff, and third-party witnesses. In particular, Exhibits A and B contain the names and phone numbers for third-party witnesses, which on information and belief, are not publicly available. Exhibits A and B also contain highly sensitive information about Plaintiff’s assault and her medical treatment as a result of said assault.

4. The disclosure of Exhibits A and B could harm Plaintiff’s and third-party witnesses’ legitimate privacy interests. No less restrictive alternative to sealing these Exhibits would protect the legitimate privacy interests of Plaintiff and third-party witnesses. The Exhibits consist in their entirety or near-entirety of information that should be sealed as set forth in Defendants’ Motion and in Plaintiff’s statement in support of Defendants’ Motion. Actions short of sealing Exhibits A and B would not protect Plaintiff’s privacy interests or the legitimate privacy interests of third-party witnesses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 9, 2025.

By: /s/ Rachel Abrams

Rachel Abrams